

Policy and Procedure on Information Governance

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1. Monitoring and Review

- 1.1.** The Proprietor will undertake a formal review of this policy for the purpose of monitoring and of the efficiency with which the related duties have been discharged, by no later than one year from the date of approval shown above, or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.

Signed:



Anne Marie Carrie
Proprietor, Cambian Group
May 2016

2. Terminology

2.1. Our aim is to use consistent terminology throughout this policy and all supporting documentation as follows:

'Establishment' or 'Location'	this is a generic term which means the Children's Home/school/college/office.
Individual	means any child or young person under the age of 18 or young adult between the ages of 18 and 25 or employees of the Cambian Group.
Service Head / Head of Service	This is the senior person with overall responsibility for the Location.
Key Worker	Members of staff that have special responsibility for Individuals residing at or attending the Establishment.
Parent, Carer, Guardian	means parent or person with Parental Responsibility
Regulatory Authority	Regulatory Authority is the generic term used in this policy to describe the independent regulatory body responsible for inspecting and regulating services.
Social Worker	This means the worker allocated to the child/family. If there is no allocated worker, the Duty Social Worker or Team Manager is responsible.
Placing Authority	Placing Authority means the local authority/agency responsible for placing the child or commissioning the service
Staff	Means full or part-time employees of Cambian, agency workers, bank workers, contract workers and volunteers.

3. Definitions

Information Governance (IG):

3.1. IG is a framework to bring together all of the requirements, standards and best practice that apply to the handling of information.

Information Governance Steering Group:

3.2. The Group responsible for developing the procedures for IG and generally promoting IG best practice throughout Cambian Group.

Senior Information Risk Owner (SIRO):

3.3. The Cambian Group Board member responsible for leading the group IG programme and acting as advocate for Information Risk on the Board.

Caldicott Guardian:

3.4. The senior clinical professional who has a strategic role for the management of Individuals information, including agreeing and reviewing protocols governing the protection, use and disclosure of Individuals information.

The Health and Social Care Network Connection Agreement (HSCN):

3.5. The process by which organisations enter into an agreement with NHS Digital so that it can send or receive data across the Health and Social Care Network.

Data Security and Protection Toolkit (DSPT):

3.6. The Data Security and Protection Toolkit is an online assessment tool that allows organisations to measure their performance against the National Data Guardian's 10 security standards. All organisations that have access to NHS patient data and systems must use this toolkit to provide assurance annually that they are practicing good data security and that personal information is handled securely.

4. Legislation

4.1. See Appendix 1

5. Introduction

5.1. This policy covers all information systems purchased, developed and managed by, or on behalf of, the organisation and any individual directly employed or otherwise by the organisation.

5.2. This policy has been approved by and applies to Cambian Group Plc and its direct and indirect subsidiaries and references to the "Cambian Group" shall be construed as referring to all such companies.

5.3. It affects all staff.

5.4. Make sure that you are familiar with the detail and what is expected of you under the policy.

6. Purpose

6.1. To ensure that Cambian has in place a comprehensive, auditable policy on the manner in which it acquires, processes, stores, shares and disposes of information assets for which it is responsible.

6.2. Information is a vital asset, both in terms of the clinical/educational management of individual individuals and the efficient management of services and resources. Information governance plays a key part in supporting clinical governance, service planning and performance management.

6.3. It is therefore of paramount importance to ensure that information is efficiently managed, and that appropriate policies, procedures and management accountability and structures provide a robust governance framework for information management.

6.4. Cambian believes that accurate, timely and relevant information is essential to deliver the highest quality health care and education services. As such it is the responsibility of all clinicians, teachers and managers to ensure and promote the quality of information and to actively use information in decision making processes.

6.5. Specific areas within Information Governance are covered in more detail by the Policies and Procedures detailed in GIG 1.1 - Appendix 1.

7. Policy

Scope of Policy

7.1. For the purposes of this and related policies Information is defined as – data that can be stored in any format, e.g. paper, electronic, audio or visual, or can be passed by word of mouth.

7.2. This policy covers all aspects and types of information within the organisation including:

- Individual's Information.
- Personnel Information.
- Organisation Information.
- Structured record systems: paper and electronic.
- Unstructured information: paper and electronic.

- Transmission of information: fax email post and telephone.

8. Procedures

Scope of Information Governance

- 8.1. Personal Information Governance is a framework to enable Cambian to handle personal and corporate information legally, securely, efficiently and effectively, to deliver the best possible care. It is formed of the following initiatives:
- Information Security & Risk Management.
 - Data Protection and Confidentiality.
 - Information Lifecycle (including Records Management).
- 8.2. Cambian recognises the need for an appropriate balance between openness and confidentiality in the management and use of information
- 8.3. Cambian fully supports the principles of corporate governance and recognises its public accountability, but equally places importance on the confidentiality of, and the security arrangements to safeguard, both personal information about individuals and employees and commercially sensitive information.
- 8.4. Cambian also recognises the need to share Individuals' information with other health/education organisations and other agencies in a controlled manner consistent with the interests of the Individual and, in some circumstances, legal compulsion and the public interest.
- 8.5. Cambian will develop and maintain a communications strategy to ensure that individuals (and relatives) are aware of the need for Cambian to hold their personal information, the processes which Cambian use, and the rights they hold as data subjects and Individuals.
- 8.6. Cambian undertakes to maintain high standards of information handling by reference to the **HORUS** model, where information is:
- Held securely and confidentiality.
 - Obtained fairly and efficiently.
 - Recorded accurately and reliably
 - Used effectively and ethically.
 - Shared appropriately and lawfully.
- 8.7. In order to do this, Cambian abide by the following principles:
- 8.8. Cambian seeks to protect its computer systems from misuse and to minimise the impact of service breaks through general compliance with the requirements of ISO27001 and the development procedures to manage and enforce this. The details of this can be found in policy document **GIG 9: Information Security Policy**.
- 8.9. Cambian will ensure that all information recorded by Cambian is accurate, complete and available appropriately.
- 8.10. Cambian will use all appropriate and necessary means to ensure that it complies with the Data Protection Act (2018), the General Data Protection Regulations (GDPR) and associated Codes of Practice issued by the Information Commissioner's Office. The details of this can be found in policy document **GIG 02: Data Protection & Confidentiality Policy**.

- 8.11.** Cambian will obtain and share information in compliance with the common law of confidentiality and the Data Protection Act. The details of this can be found in policy document G IG 7: Data Protection & Confidentiality Policy and the associated [GIG 09: Confidentiality Code of Practice](#).
- 8.12.** Although not a public authority as defined in the FOIA, Cambian will use all appropriate and necessary means to ensure that insofar as it is required to, it complies with the Freedom of Information Act (2000) and associated Codes of Practice. In practice, this means that Cambian Group will comply with any contractual requirements regarding the Freedom of Information Act (FOIA) and as a general rule will refer any FOIA request back to the public body who commissioned the services.
- 8.13.** Cambian will have a systematic and planned approach to the management of records within the organisation, from their creation to their ultimate disposal, as per [GIG 8: Cambian Information Lifecycle Policy](#).

Year on Year Improvement Plan and Assessment

- 8.14.** A self-assessment of compliance with the requirements of the Data Security and Protection Toolkit and Cyber Essentials accreditation will be undertaken each year by the Information Governance Steering Group.
- 8.15.** In response to the above assessment Cambian will formulate an Information Governance Improvement Plan each year which will detail the action plans that have been raised through the Toolkit.
- 8.16.** Cambian will undertake audits of compliance with the policies and procedures relating to Information Governance on a regular basis.

Awareness and Training

- 8.17.** All employees will carry out as part of their induction, and then annually thereafter, Information Governance awareness training via the group Achieve E-learning Web Portal. All staff are to complete the assessment tool.
- 8.18.** Top-up or role-based training will be given, or organised, where necessary and at least every 2 years; this can be requested by an individual wanting personal development or arranged at the discretion of a line manager. Contact should be made with a member of the Information Governance Steering Group with regard to this.
- 8.19.** Cambian will undertake to ensure the 'Initiative Leads' are given the appropriate training necessary to fulfil their role.
- 8.20.** Cambian will also take steps to ensure that there is the appropriate level of awareness within the organisation and arrange awareness campaigns.

9. Accountability

- 9.1.** The management of Information Governance across the organisation will be coordinated by the Information Governance Steering Group, the Terms of Reference for which are included in [GIG 1.2 - Appendix 2](#).
- 9.2.** The Director having responsibility for Information Governance is the Senior Information Risk Owner. The supporting organisational structure is provided in [GIG 01.3 - Appendix 3](#).
- 9.3.** The diversity of subjects covered requires the identification of a 'lead' for each initiative. 'Initiative Leads' will be the local expert in the particular subject. The posts designated as Leads are given in [GIG 01.3 - Appendix 3](#).
- 9.4.** The Information Governance Steering Group's role is to:
- Ensure a co-ordinated approach to Information Governance across the Cambian Group;
 - Identify best practice, define and deliver improvement plans;
 - Work closely with employees across the organisation to ensure that Information Governance standards are understood and adhered to.

9.5. Heads of Establishment within Cambian have been designated as Data Protection Champion for their establishment and are responsible for ensuring that the policy and supporting standards and guidelines are built into local processes and that there is on-going compliance.

10. Standard Forms, Letters and Relevant Documents

10.1. GIG 1.1 – Appendix 1 – Related Policies and Procedures

10.2. GIG 1.2 – Appendix 2 – Information Governance Steering Group Terms of Reference

10.3. GIG 1.3 – Appendix 3 – Information Governance Steering Group Structure